

DISTRICT COURT

FOURTH JUDICIAL DISTRICT

File No. 27-CV-23-9758

City of Long Lake,

CASE TYPE:

Plaintiff,

V.

DECLARATION OF COLE FARLEY

City of Orono,

Defendant.

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

I, Cole Farley, declare as follows:

1. I am a current firefighter with the Long Lake Fire Department. I have personal knowledge of the facts contained herein and am competent to testify to them.
2. On September 26, 2023, I learned that my friend and former colleague at the Long Lake Fire Department had applied to the Orono Fire Department.
3. My relationship with this individual is one that is animated, funny, and good natured. Our communications and text messages back and forth reflect this relationship.
4. At 6:30 pm, I sent a text message to my friend asking him if the “rumors” were true that he was joining Orono Fire Department, and in an effort to match his wit, I added, “I have always known that your decision making skills were sus, but now you’re not even trying.”
5. We continued the text conversation as we normally would and even stated that we were looking forward to seeing more of each other, presumable as he serves as a member of the Orono Fire Department.

6. I did not pressure him not to apply to the Orono Fire Department.

7. Later, on the evening of September 26, 2023, I received an unsolicited call from Orono Mayor Dennis Walsh claiming that phone calls that have been happening that were slanderous, malicious, and smearing.

8. Mayor Walsh told me that anyone who was part of these calls is subject to lawsuits.

9. I told Mayor Walsh that I had no idea what he was talking about.

10. Mayor Walsh reiterated what I interpreted to be a threat, explaining the trouble that “someone” would be in if this doesn’t stop immediately and the difficulty that comes to “someone” through a lawsuit.

11. I again told Mayor Walsh that I had no idea what he was talking about.

12. Mayor Walsh continued to threaten that lawsuits could come to “anyone involved.”

13. Due to Mayor Walsh’s status as a person in a position of power with ample resources and experience with the legal system, his threats of litigation made me scared for my wellbeing and for the wellbeing of my family.

14. On September 28, 2023, I sent an email to the membership of the Long Lake Fire Department recapping the situation. A true and accurate copy of my email is attached hereto as **Exhibit A**.

15. On the evening of September 28, 2023, I received a text message from Mayor Walsh asking if I knew the firefighter who applied for the Orono Fire Department. It read: “You know Blair too? Small world.” He followed that message with another that read: “it’s just amazing how everybody knows everybody. The 6 degrees of separation get to be down to 1 or 2 degrees of separation.”

16. I felt extremely uneasy over Mayor Walsh's text messages. It felt as though he was watching me. The nervous urgency that I felt was so jarring that I abruptly left the home of a friend that I had stopped to visit.

17. On September 29, 2023, I met with Orono Chief Van Eyll at a local Caribou. Chief Van Eyll acknowledged that he was aware that the text message from myself to my friend who applied with the Orono Fire Department was taken out of context. Chief Van Eyll further said that he would clarify the situation with Mayor Walsh.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Executed on October 13, 2023 in Hennepin County, Minnesota.

s/Cole Farley
Cole Farley

4868-4759-6676, v. 1

EXHIBIT A



Charlie Miner <cminer@longlakemn.gov>

Threatening phone calls

1 message

Mike Heiland <mheiland@longlakemn.gov>
To: Charlie Miner <cminer@longlakemn.gov>

Thu, Sep 28, 2023 at 3:02 PM

Team

I received a phone call on Tuesday night from an elected Orono representative who very sternly threatened lawsuits against me and anyone else involved in a string of slanderous / threatening / malicious phone calls that had been made. I assured this individual that I had no idea what they were talking about and that I was not involved. They did not seem convinced by my statement of innocence and continued to impress upon me the seriousness of the litigation that would come down on anyone involved if it did not stop immediately. I still today have no idea what this individual was referring to and have not been involved in any such malicious activity.

I bring this up in case any one of you have had similar encounters with any Orono representatives. If you have, please reach out to Chief Heiland to discuss the situation.

Additionally, if anyone has information about any slanderous / threatening / malicious phone calls that have been made recently please let me know as I now find myself in a position where I may need to defend myself and/or do reputation damage control.

Thank you



Cody Farley, Dpt. Training Chief 5
LONG LAKE FIRE DEPARTMENT

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952.221.8699 (Cell)



Mike Heiland, Fire Chief
LONG LAKE FIRE DEPARTMENT

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